

## FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 8, 1997

Robert K. Wilson, Treasurer Ohio Republican Party 172 East State Street Columbus, OH 43215

Identification Number: C00162339

Reference: July Quarterly (4/1/96-6/30/96) and 30 Day Post-General

(10/17/96-11/25/96) Reports

Dear Mr. Wilson:

On April 9, 1997 you were notified that a review of the above-referenced report(s) raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act.

Your April 21, 1997 response is incomplete because you have not provided all the requested information. For this response to be considered adequate, the following information is still required.

-The Commission acknowledges your response concerning your disclosure of the RNC in-kind services to Marketing Resource Group, Targeted Creative Communications, Inc. and Datamark, Inc.; however, your committee is not reporting these in-kind services properly.

It appears that the RNC made several shared allocable disbursements as in-kind services on your committee's behalf using your allocation ratio. The receipt of in-kind services should be reported on Schedule A supporting Line 12 of the Detailed Summary Page to properly disclose the Federal share of these RNC in-kind services. Each entry should be itemized separately to disclose the provider of the in-kind services (RNC), date of the in-kind services, vendor and amount. Federal receipts in the amount of \$14,221.28 should be reported in this manner. The receipt of the Non-Federal share of the RNC in-kind services should be reported on Schedule H3 and marked as "in-kind services." Non-Federal receipts in the amount of \$27,533.51 should be reported in this manner.

To offset the receipts for the RNC's in-kind services, you must provide a Schedule H4 which discloses the Federal and Non-Federal shares of these in-kind services. The Federal share on Schedule H4 should be the amount reported by the RNC's Federal Account and the Non-Federal share on Schedule H4 should be the amount reported by the RNC's Non-Federal Account. All of these totals must be labeled "in-kind." For example, the total amount disbursed by the RNC to Targeted Creative Communications, Inc. on your behalf was \$10,856.85; of this amount, \$3,582.76 was from the RNC's Federal Account and \$7,274.09 was from its Non-Federal Account. These amounts should be reported on Schedule H4 in the columns titled Total Amount, Federal Share and Non-Federal Share, respectively.

By properly disclosing these in-kind services by the RNC in the above manner, your cash figures will not be inflated. Please make the necessary amendments to your reports.

If this information is not received by the Commission within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Melissa Hurd on our toll-free number (800) 424-9530 or our local number (202) 219-3580.

Sincerely.

John D. Gibson

Assistant Staff Director

Reports Analysis Division